

J. SCOTT MOEDE, OSB 934816  
Chief Deputy City Attorney  
scott.moede@portlandoregon.gov  
NAOMI SHEFFIELD, OSB 170601  
Deputy City Attorney  
naomi.sheffield@portlandoregon.gov  
ROBERT YAMACHИKA, OSB 065560  
Senior Deputy City Attorney  
rob.yamachika@portlandoregon.gov  
Portland City Attorney's Office  
1221 SW 4th Ave., Rm. 430  
Portland, OR 97204  
Telephone: (503) 823-4047  
Facsimile: (503) 823-3089  
*Of Attorneys for Defendant City of Portland*

**UNITED STATES DISTRICT COURT**  
**DISTRICT OF OREGON**  
**PORLAND DIVISION**

DON'T SHOOT PORTLAND, a nonprofit corporation, in its individual capacity, NICHOLAS J. ROBERTS, in an individual capacity and on behalf of themselves and all others similarly situated, MICHELLE "MISHA" BELDEN, in an individual capacity and on behalf of themselves and all others similarly situated, ALEXANDRA JOHNSON, in an individual capacity and on behalf of themselves and all others similarly situated,

**3:20-cv-00917-HZ**

**DECLARATION OF J. SCOTT MOEDE**

**(In Support of Defendant City of Portland's Response to Plaintiffs' Motion for Preliminary Injunction)**

**PLAINTIFFS,**

v.

CITY OF PORTLAND, a municipal corporation, and MULTNOMAH COUNTY, a political subdivision of the State,

**DEFENDANTS.**

I, J. Scott Moede, Chief Deputy City Attorney, declare as follows:

1. I make this declaration in support of the City's response to plaintiff's motion for preliminary injunction.
2. The Portland Business in an Oregon nonprofit corporation.

3. According to its website, the Portland Business Alliance is the Greater Portland Chamber of Commerce and the leading voice for business in the region.

4. The website also indicates that the Alliance advocates for business at all levels of government to support commerce, community health and the region's overall prosperity.

5. According to information received from the Alliance and widely disseminated to the public, the Alliance conducted a business impact survey seeking information about the impacts of the protests and property damage in Portland that started at the end of May 2020. The survey sought information on physical damage to property including interior and exterior, lost revenue to date, and amounts covered by insurance.

6. There were 93 voluntary responses. A spreadsheet of the responses is provided in this link as [Exhibit 2](#).

7. In the information disseminated to the City of Portland and to the public, the survey results estimated \$4,808,099 in property damage with \$28,495 being the average.

8. In the information disseminated to the City of Portland and to the public, lost revenue through 6/18/2020 was reported as \$18,407,000.

9. Overall, the survey illustrates that between physical damage and lost revenue, Portland's greater Central City area has experienced an estimated \$23,215,099 in economic loss.

10. The survey results have been widely distributed throughout the community and reported on <https://www.kgw.com/article/news/local/protests/portland-business-alliance-puts-out-report-on-damages-during-riots/283-927c8812-0010-4561-921a-f0556a5b1a2b>.

**I hereby declare that the above statement is true to the best of my knowledge and belief, and that I understand it is made for use as evidence in court and is subject to penalty for perjury.**

DATED: July 2, 2020.

/s/ J. Scott Moede  
J. Scott Moede